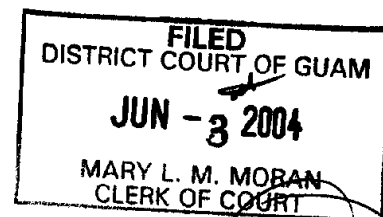


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	NOTICE OF EX PARTE
)	APPLICATION ON MOTION
Plaintiffs,)	TO STAY ORDER
)	GRANTING, IN PART,
v.)	MOTION TO COMPEL
)	PENDING RULING BY
HONGKONG AND SHANGHAI)	DISTRICT JUDGE ON
BANKING CORPORATION, LTD.,)	HSBC'S OBJECTIONS
et al.,)	
Defendants.)	
_____)	

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on _____, 2004, at the hour of _____m., Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will bring the following Ex Parte Application before the Court.

Concurrently with this Ex Parte Application, HSBC has filed a Motion to Stay Order Granting, In Part, Motion to Compel Pending Ruling By District Judge On HSBC's Objections ("Motion"). It is important and urgent that the Ex Parte Application and Motion be heard as soon as possible because HSBC's right to have

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objections to the Order filed herein on May 27, 2004, granting, in part, Plaintiffs' motion to compel ("Order") determined by the district judge will be nullified and rendered moot if a stay is not granted. Since compliance with the Order and production of the documents is required on June 4, 2004, a number of days before HSBC is even required to file its objections under Rule 72(a), it would be impossible for the district judge to consider, much less rule upon, HSBC's objections before the date of compliance. If HSBC complies with the Order on June 4 and produces the documents which are the subject of the objections, then the objections are rendered moot and HSBC's rights under Rule 72(a) will have been nullified.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declaration of Jacques G. Bronze concurrently filed herewith.

Dated this 5th day of June, 2004.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By: _____

JACQUES G. BRONZE